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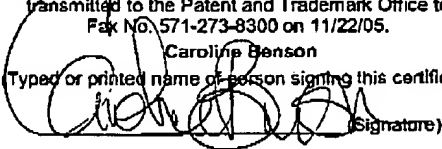
Application No.	:	09/683,239
Filed	:	12/05/2001
Inventor(s)	:	Gregory T. Grefenstette et al.
Docket No.	:	A1320Q-US-NP
Confirmation No.	:	8312
Examiner	:	Joshua D. Campbell
Art Unit	:	2178
Title	:	META-DOCUMENT MANAGEMENT SYSTEM WITH DOCUMENT IDENTIFIERS
Customer No.	:	25453

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

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RESPONSE AND REQUEST FOR RECONSIDERATION

Sir:

The FINAL Office Action of September 22, 2005 has been carefully considered. Reconsideration of this application is respectfully requested. Claims 1-20 are pending in this application. Of these, claims 1, 9, and 12 are independent claims. An Amendment faxed July 7, 2005 amended claims 1, 5, and 9-14, and added claims 15-20.

1. Response to Rejection Under 35 USC 103

The Office Action on pages 2-8 rejects claims 1-7 and 9-20 under 35 USC 103(a) as being unpatentable over Horowitz et al., U.S. Patent 6,122,647 (hereinafter "Horowitz") in view of Goodisman et al., U.S. Patent Application Publication 2002/0069223, filed October 3, 2001 (hereinafter "Goodisman Application") that claims priority to Provisional Patent Application Serial No. 60/249498, filed November 17, 2000 (hereinafter "Goodisman Provisional").

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1.A Reliance On Goodisman As A Reference

Because the Office Action continues to rely on paragraphs disclosed in the Goodisman Application filed October 3, 2001, and not solely on disclosure in the Goodisman Provisional filed November 17, 2000, Applicant continues to maintain that those paragraphs of Goodisman Application cited in the Office Action may not be relied on as a 102/103 reference as they relate to the disclosure of its perfected fling not disclosed in its provisional filing (filed November 17, 2000), where the Goodisman Application was filed October 3, 2001 after the provisional application filed August 13, 2001 by Applicant to which the instant Application filed December 5, 2001 claims priority.

More specifically, Applicant submits that of *section C* which describes the claimed subject matter (paragraphs 0158-0206) in Applicant's perfected application filed December 5, 2001, only the following paragraph (and identified contents) are not disclosed in the Provisional Application No. 60/311,857, filed August 13, 2001, to which the instant application claims priority: 0182 (entire paragraph), 0184 ("or suggested"), 0185 ("or the time and/or date at which the suggestion is made") and 0187 (entire paragraph). Applicant therefore maintains that the claimed invention is fully supported by Applicant's Provisional Application filed August 13, 2001.

In view of the forgoing and the comments in "Response to Arguments" section 6 on page 9 of the Office Action, Applicant assumes in responding to the claim rejections in the Office Action below that the rejection in view of Goodisman is based on the disclosure on page 7 "Devices" and pages 10-12 "Location Services" in Goodisman Provisional.

1.B Rejection of Independent Claims 1, 9 and 12

In rejecting claims 1, 9, and 12, the Office Action, on pages 2-3, asserts sections of Horowitz (col. 5, lines 56-54; col. 9, lines 1-63, col. 10, lines 8-27; col. 11, lines 24-52) and Goodisman (page 7 "Devices" and pages 10-12 "Location Services" (as noted above)) render Applicant's claim invention recited in independent claims 1, 9, and 12 unpatentable.

Generally, Horowitz discloses a method for creating contextual hyperlinks in a source document, where the hyperlinks associate the source document with available target documents. The method includes selecting terms relevant to the

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user through linguistic analysis, from which relevant target documents are identified. A tagging module receives user selected portions of a document and selects terms to be used for establishing contextual links. A presentation module identifies topics in the knowledge base associated with the selected terms, and creates hyperlinks between the terms in the source document and target documents. (See Horowitz Abstract.)

Generally, Goodisman Provisional discloses "a context-sensitive engine for interpreting data transmitted between [a] server and [a] wireless device" (see Goodisman p. 22, lines 6-7). Further Goodisman Provisional discloses location services that include directions, radius search, tracking, dynamic proximity, itinerary/schedule, location analysis, dynamic proximity, probabilistic location determination, user profile creation based on location tracking, extrapolating conditions based on wireless device density (see Goodisman Provisional, pages 10-11).

More specifically, the cited sections in the Office Action of Horowitz and Goodisman Provisional may be summarized as follows:

Horowitz disclose: (a) an implementation of a knowledge base in which topics and terms are stored in a topic-term table, where each topic in the knowledge base may have a unique ID code for cross-referencing in other tables (see Horowitz col. 5, lines 56-54); (b) unified noun phrases and nouns are selected based on frequency of occurrence and tagged using a knowledge base (see Horowitz col. 9, lines 1-63); (c) a process of generating links to target documents by looking up topics for each tag and linking documents associated with the topic to the term in the tag (see Horowitz col. 10, lines 8-27); (d) a server that is adapted to pass user selected portions of a page to a tagging module which generates tags for the selected portion (see Horowitz col. 11, lines 24-52).

Goodisman disclose support protocols for the mobile devices (see Goodisman p. 7, 10-12) and location services: that include directions (e.g., ties to mapquest.com), radius search (e.g., all _ within _ radius), tracking (e.g., follow a target through a system), dynamic proximity (e.g., determine who is nearby), itinerary/schedule (e.g., data point for events), location

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analysis (e.g., convert longitude/latitude to known location), dynamic proximity (e.g., identify groups of people that are near), probabilistic location determination (e.g., combining scheduling information to determine where a user is), user profile creation based on location tracking (e.g., creating a preference profiles), extrapolating conditions based on wireless device density (e.g., calculating traffic condietions) (see Goodisman Provisional, pages 10-11).

In contrast, Applicant's invention recited in independent claim 1 sets forth a method for enriching content of a document by associating a personality identifier (where a personality identifies an enrichment theme) with a reading device (e.g., an electronic tag reader). The reading device associates a recorded document identifier with the personality identifier of the reading device before transmitting both to a meta-document server for enrichment to be performed according to the enrichment theme of the personality identified by the personality identifier. More specifically, the cited sections of Horowitz and Goodisman Provisional fail to disclose or suggest the *association of a personality identifier with a reading device* and *the association of a document identifier (recorded with the reading device) with the personality identifier*, wherein the document identifier and the personality identifier are transmitted to a meta-document server that recognizes and annotates entities in the electronic document related to the enrichment theme of the personality identified by the personality identifier. Instead, Goodisman Provisional discloses location services (described above) that read singly or together with the contextual creation of hyperlinks disclosed in Horowitz (also described above), fail to disclose or suggest the recognition and annotation of entities in electronic document content identified by a recorded document identifier, as claimed by Applicant, where a personality identifier is associated with a reading device and a document identifier once recorded by the reading device is associated with the personality.

Also unlike Horowitz taken singly or together with Goodisman Provisional, Applicant's invention recited in independent claims 9 and 12 sets forth a method for *enriching content of a document selected at a mobile computing device* by identifying position coordinates of the mobile computing device *where the document content is selected*, and thereafter looking up a personality identifier using the position coordinates, at the mobile computing device (claim 9) or at a meta-

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document server (claim 12), before enriching the document content according to the enrichment theme of the personality identified by the personality identifier. Instead, the location services disclosed in Goodisman Provisional describe, for example, probabilistic location determination for determining where a user actually is and profile creation based on location tracking. Such disclosed location services in Goodisman Provisional taken singly or together with Horowitz fail to disclose or suggest Applicant's claimed invention which recites the *identification of position coordinates of a mobile computing device where electronic document content is referenced* and *thereafter enriching the electronic document content with* a personality identifying enrichment themes that is looked up using the position coordinates.

1.C Summary

In view of the arguments presented above, Applicant respectfully submits that independent claims 1, 9 and 12 are patentably distinguishable over Horowitz taken singly or in combination with Goodisman.

Insofar as claims 2-7, 10-11, and 13-20 are concerned, these claims depend from one of now presumably allowable independent claims 1, 9, and 12 and are also believed to be in allowable condition. Insofar as claim 8 is concerned, the Office Action on pages 8-9 rejects claim 8 under 35 USC 103(a) as being unpatentable over Horowitz in view of Goodisman as applied to claim 1, and further in view of Keith JR, U.S. Patent Application Publication 2002/0032672. There is no need to specifically address the merits of the rejection of claim 8 because it depends claim 1 which is clearly patentable for the reasons set forth above.
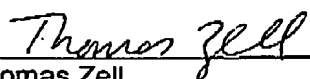
2. Fee Authorization And Extension Of Time

No additional fee is believed to be required for this amendment or response, however, the undersigned Xerox Corporation attorney hereby authorizes the charging of any necessary fees, other than the issue fee, to Xerox Corporation Deposit Account No. 24-0025. This also constitutes a request for any needed extension of time and authorization to charge all fees therefor to Xerox Corporation Deposit Account No. 24-0025.

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3. Conclusion

In view of the foregoing remarks, reconsideration of this application and allowance thereof are earnestly solicited. In the event the Examiner considers a personal contact advantageous to the disposition of this case, the Examiner is hereby requested to call Attorney for Applicant(s), Thomas Zell.

Respectfully submitted,

Thomas Zell

Thomas Zell
Attorney for Applicant(s)
Registration No. 37,481
Telephone: 650-812-4281
Date: 11/22/05